

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS SERVICE
STANDARD CHANGES, 2021

Docket No. N2021-1

**MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL
SERVICE WITNESS MONTEITH OF PostCom/USPS-T2-2(c) OF POSTAL
COMMERCE'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS REDIRECTED FROM WITNESS WHITEMAN (USPS-T-2)**

(May 19, 2021)

The United States Postal Service (the "Postal Service") hereby moves for late acceptance of its response to PostCom/USPS-T2-2(c) of PostCom's First Interrogatories and Requests for Production of Documents, issued on May 11, 2021, which was redirected to witness Monteith (USPS-T-4) from witness Whiteman (USPS-T-2). 39 C.F.R. § 3010.162. Due to the time needed to validate the data provided in response to PostCom/USPS-T2-2(c), the Postal Service was unable to submit its response to that interrogatory by 4:30 p.m. on May 18, 2021. Accordingly, the Postal Service respectfully requests late acceptance of its response to PostCom/USPS-T2-2(c), submitted herewith. The Postal Service does not believe that any party will be prejudiced by this request. PostCom's counsel of record was served with a courtesy copy of the response on May 18, 2021.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 19, 2021